

EX PARTE OR LATE FILED



Paige Anderson
Associate Counsel
International Affairs
Law & Public Policy

1133 19th Street, NW
Washington, DC 20036
Tel: 202-736-6047
Fax: 202-736-6083
paige.anderson@mci.com

ORIGINAL

April 27, 2005

Ex Parte

RECEIVED

APR 27 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

**Re: In the Matter of the Reporting Requirements for U.S. Providers of
International Telecommunications Services, IB Docket No. 04-112**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's rules, 47 C.F.R. Section 1.1206, MCI, Inc. ("MCI") hereby submits this letter summarizing an *ex parte* presentation yesterday, April 26, 2005, in the above-referenced docket. Simon Kim and I (both from MCI) met with the following staff members from the International Bureau and the Wireline Competition Bureau: David Krech, Jerry Duvall, Jim Lande, Claudia Fox, Irene Wu, Linda Blake, Peggy Reitzel, John Copes and Cathy Hsu.

The discussion in our meeting focused on MCI's views on the above-referenced NPRM. We reviewed the positions represented in our comments and reply comments, and urged that the current reporting requirements under 43.61 and 43.82 should be significantly streamlined. We also discussed the reasons MCI believes the FCC's proposals for new and more detailed reporting requirements should not be adopted. In addition, we provided information on the internal resources devoted to the current reporting requirements, and why the proposed changes would significantly expand the financial and human resources within the company that are devoted to the reporting process.

The staff also mentioned several areas they would like MCI to address in a subsequent *ex parte* meeting.

No. of Copies of this
Letter to be
042

April 27, 2005

Page 2 of 2

Two copies of this notice (and an attachment) are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paige', followed by a long horizontal line extending to the right.

Paige Anderson

Copy to:
Linda Blake
John Copes
Jerry Duvall
Claudia Fox
Cathy Hsu
David Krech
Jim Lande
Peggy Reitzel
Irene Wu

Ex Parte Presentation
Reporting Requirements for U.S. Providers of International
Telecommunications Services
(IB Docket No. 04-112)
MCI, Inc.
April 26, 2005

I. The Commission should eliminate the unnecessary and burdensome reporting requirements in sections 43.61 and 43.82.

- Background: MCI currently devotes extensive financial and personnel resources for this reporting process.
- Any revised reporting obligations must balance benefits with any burdens imposed on carriers.

II. MCI supports reforms that will streamline or reduce the reporting process.

We support the following specific proposals:

- Create a streamlined annual 43.61 & 43.82 report;
- Eliminate quarterly traffic and revenue reports for large carriers;
 - The FCC can request specific information from carriers on a case by case basis if needed.
- Eliminate reporting of the number of IMTS messages;
- Eliminate reporting of US Offshore Points;
- Adopt an alternate threshold for Miscellaneous or De Minimis Services;
 - Don't report services that have less than \$5 million in annual revenue; or services that represent less than 0.10 percent of a carrier's annual revenues.
 - This approach should minimize reporting of declining or de minimis services.
- Streamline the billing codes;
- Allow electronic filing and use of commercial spreadsheets to prepare the reports.

MCI also supports reforms that will make the report more timely:

- Change the filing date (for the joint annual report) to May 1.

III. MCI opposes changes that would expand the current reporting process or make it significantly more burdensome.

- The NPRM proposes new reporting requirements that would, if adopted, make the reporting process significantly more expensive and time consuming.
 - Examples.
 - Separate Retail vs. Wholesale IMTS Traffic & Revenues. The FCC requests that carriers separate traffic by source ☐ retail vs. wholesale. (Schedule 2).
 - Separate and Report Non-Route Specific IMTS Revenues. Also request that carriers break out route specific traffic and “non-route specific” traffic. (Schedule 2).
 - Request Revenues for Private Line and Data Services to be Separated Between Services Provided over Owned Facilities and those Provided Over Resold Facilities. (Schedule 6).
- It would extremely difficult to gather the requested information from our billing and traffic systems.
- We do not support changes to the reporting process that would require us to create entirely new systems for data collection and data verification.

IV. Additional Requests.

- Continued confidential treatment of sensitive competitive data.
- Limit reporting to telecommunications services.

EX PARTE OR LATE FILED



Paige Anderson
Associate Counsel
International Affairs
Law & Public Policy

1133 19th Street, NW
Washington, DC 20036
Tel: 202-736-6047
Fax: 202-736-6083
paige.anderson@mci.com

April 27, 2005

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

APR 27 2005

Federal Communications Commission
Office of Secretary

**Re: In the Matter of the Reporting Requirements for U.S. Providers of
International Telecommunications Services, IB Docket No. 04-112**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's rules, 47 C.F.R. Section 1.1206, MCI, Inc. ("MCI") hereby submits this letter summarizing an *ex parte* presentation yesterday, April 26, 2005, in the above-referenced docket. Simon Kim and I (both from MCI) met with the following staff members from the International Bureau and the Wireline Competition Bureau: David Krech, Jerry Duvall, Jim Lande, Claudia Fox, Irene Wu, Linda Blake, Peggy Reitzel, John Copes and Cathy Hsu.

The discussion in our meeting focused on MCI's views on the above-referenced NPRM. We reviewed the positions represented in our comments and reply comments, and urged that the current reporting requirements under 43.61 and 43.82 should be significantly streamlined. We also discussed the reasons MCI believes the FCC's proposals for new and more detailed reporting requirements should not be adopted. In addition, we provided information on the internal resources devoted to the current reporting requirements, and why the proposed changes would significantly expand the financial and human resources within the company that are devoted to the reporting process.

The staff also mentioned several areas they would like MCI to address in a subsequent *ex parte* meeting.

April 27, 2005

Page 2 of 2

Two copies of this notice (and an attachment) are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paige', followed by a long horizontal line extending to the right.

Paige Anderson

Copy to:
Linda Blake
John Copes
Jerry Duvall
Claudia Fox
Cathy Hsu
David Krech
Jim Lande
Peggy Reitzel
Irene Wu

Ex Parte Presentation
Reporting Requirements for U.S. Providers of International
Telecommunications Services
(IB Docket No. 04-112)
MCI, Inc.
April 26, 2005

I. The Commission should eliminate the unnecessary and burdensome reporting requirements in sections 43.61 and 43.82.

- Background: MCI currently devotes extensive financial and personnel resources for this reporting process.
- Any revised reporting obligations must balance benefits with any burdens imposed on carriers.

II. MCI supports reforms that will streamline or reduce the reporting process.

We support the following specific proposals:

- Create a streamlined annual 43.61 & 43.82 report;
- Eliminate quarterly traffic and revenue reports for large carriers;
 - The FCC can request specific information from carriers on a case by case basis if needed.
- Eliminate reporting of the number of IMTS messages;
- Eliminate reporting of US Offshore Points;
- Adopt an alternate threshold for Miscellaneous or De Minimis Services;
 - Don't report services that have less than \$5 million in annual revenue; or services that represent less than 0.10 percent of a carrier's annual revenues.
 - This approach should minimize reporting of declining or de minimis services.
- Streamline the billing codes;
- Allow electronic filing and use of commercial spreadsheets to prepare the reports.

MCI also supports reforms that will make the report more timely:

- Change the filing date (for the joint annual report) to May 1.

III. MCI opposes changes that would expand the current reporting process or make it significantly more burdensome.

- The NPRM proposes new reporting requirements that would, if adopted, make the reporting process significantly more expensive and time consuming.
 - Examples.
 - Separate Retail vs. Wholesale IMTS Traffic & Revenues. The FCC requests that carriers separate traffic by source — retail vs. wholesale. (Schedule 2).
 - Separate and Report Non-Route Specific IMTS Revenues. Also request that carriers break out route specific traffic and “non-route specific” traffic. (Schedule 2).
 - Request Revenues for Private Line and Data Services to be Separated Between Services Provided over Owned Facilities and those Provided Over Resold Facilities. (Schedule 6).
- It would extremely difficult to gather the requested information from our billing and traffic systems.
- We do not support changes to the reporting process that would require us to create entirely new systems for data collection and data verification.

IV. Additional Requests.

- Continued confidential treatment of sensitive competitive data.
- Limit reporting to telecommunications services.